

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	
	)	Docket No. 24-cr-10132-IT
SEAN PALMER,	)	
	)	
Defendant.	)	

**JOINT MEMORANDUM PURSUANT TO LOCAL RULE 116.5(b)**

The United States of America and the defendant, through counsel, hereby submit this joint memorandum addressing Local Rule 116.5(b).

The government and the defendant request that the interim status conference, scheduled for September 19, 2024, be cancelled and a further interim status conference date be established in approximately 45 days.

**I. Local Rule 116.5(b)(1)**

The government produced automatic discovery as required by Fed. R. Crim. P. 16 and Local Rules 116.1(c) and 116.2 on July 11, 2024. There are presently no pending discovery requests.

**II. Local Rule 116.5(b)(2)**

The government will provide discovery in response to any future request(s) according to the local rules and pursuant to the Federal Criminal Rules of Criminal Procedure, including any supplemental discovery if any additional materials are obtained.

**III. Local Rule 116.5(b)(3)**

The defendant needs additional time to review the government's automatic discovery

before determining whether it will be necessary to file a request for additional materials.

**IV. Local Rule 116.5(b)(4)**

The parties do not currently anticipate the need for a protective order.

**V. Local Rule 116.5(b)(5)**

The parties agree that it is too early to set a motion schedule under Fed. R. Crim. P. 12(b).

The defendant needs additional time to assess the need for, and timing of, dispositive motions.

**VI. Local Rule 116.5(b)(6)**

The parties have yet to agree on an appropriate schedule for expert disclosures. The parties intend to propose a schedule prior to the Final Status Conference.

**VII. Local Rule 116.5(b)(7)**

The defendant agrees to notify the government of any intended defense of insanity, public authority, or alibi prior to the Final Status Conference.

**VIII. Local Rule 116.5(b)(8)**

The Court has excluded from the speedy trial calculation all time from the defendant's initial appearance through September 19, 2024. *See* ECF Nos. 16, 20. The government and the defendant further agree that the time between September 19, 2024, and the next status conference should be excluded because the parties have been and are using the period of the continuance to complete review of discovery. Therefore, the parties request that this Court find that the ends of justice served by excluding the period of this continuance outweigh the best interest of the public and the defendant in a speedy trial, pursuant to 18 U.S.C. § 3161(h)(7)(A).

**IX. Local Rule 116.5(b)(9)**

The parties have yet to engage in plea discussions. The estimated length of the

government's case-in-chief is one week.

**X. Local Rule 116.5(b)(10)**

The government and the defendant request that an interim status conference date be established approximately 45 days in the future.

Respectfully submitted,

SEAN PALMER,  
Defendant

/s/ Sandra Gant  
Sandra Gant  
Assistant Federal Public Defender  
Federal Public Defender Office  
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JOSHUA S. LEVY,  
Acting United States Attorney

/s/ Jason A. Casey  
Jason A. Casey  
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Dated: September 13, 2024

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and by regular mail to the participants who do not receive electronic filing.

/s/ Jason A. Casey  
Jason A. Casey  
Assistant U.S. Attorney